

# EXHIBIT I

# **EXHIBIT 11**

**From:** [Loftus, Julie](#)  
**To:** [Bill Mohrman](#)  
**Cc:** [Bloom, Michael](#); [Rogers, Brooke](#); [Andrew Parker](#); [Joe Pull](#); [Roxanne A. Russell](#)  
**Subject:** RE: Lindell - Fanning Deposition  
**Date:** Tuesday, August 1, 2023 1:53:39 PM  
**Attachments:** [2023.08.01 Amended Notice of Deposition - Mary Fanning.pdf](#)  
[image561882.jpg](#)

---

Bill,

We are sorry to hear about Ms. Fanning's injuries.

As you are aware, your client must be deposed by **August 25, 2023**. To the extent Ms. Fanning is medically capable of testifying, she will need to give deposition testimony before that date. I am attaching an amended notice of deposition for **August 17, 2023**. I am calling you to discuss.

Best,  
Julie



Julie Loftus  
(she/her/hers)  
Associate | Litigation  
Benesch Friedlander Coplan & Aronoff LLP  
t: 312.624.6341 | [JLoftus@beneschlaw.com](mailto:JLoftus@beneschlaw.com)  
[www.beneschlaw.com](http://www.beneschlaw.com)  
71 South Wacker Drive, Suite 1600, Chicago, IL 60606-4637

Confidentiality Notice to Incorrect Addressee: [www.beneschlaw.com/confidentialitynotice](http://www.beneschlaw.com/confidentialitynotice)

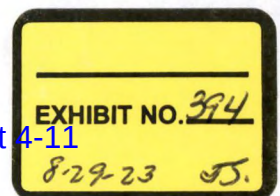
---

**From:** Bill Mohrman <[mohrman@mklaw.com](mailto:mohrman@mklaw.com)>  
**Sent:** Tuesday, August 1, 2023 12:33 PM  
**To:** Loftus, Julie <[JLoftus@beneschlaw.com](mailto:JLoftus@beneschlaw.com)>  
**Cc:** Bloom, Michael <[MBloom@beneschlaw.com](mailto:MBloom@beneschlaw.com)>; Rogers, Brooke <[BRogers@beneschlaw.com](mailto:BRogers@beneschlaw.com)>; Andrew Parker <[parker@parkerdk.com](mailto:parker@parkerdk.com)>; Joe Pull <[Pull@parkerdk.com](mailto:Pull@parkerdk.com)>; Roxanne A. Russell <[Russell@parkerdk.com](mailto:Russell@parkerdk.com)>  
**Subject:** RE: Lindell - Fanning Deposition

Everyone:

Mary Fanning had an accident on Sunday which resulted in her being admitted to a hospital yesterday. Ms. Fanning was diagnosed with a concussion and other injuries. She will not be able to be deposed on Friday. I will keep you updated on when she will be well enough to attend a deposition. Bill.

William F. Mohrman  
Mohrman, Kaardal & Erickson, P.A.  
150 South Fifth Street, Suite 3100



Minneapolis, MN. 55402  
Telephone - 612-465-0928  
Facsimile - 612-341-1076

[mohrman@mklaw.com](mailto:mohrman@mklaw.com)  
[www.mklaw.com](http://www.mklaw.com)

The information in this e-mail is confidential and may be protected by the attorney's work product doctrine or the attorney/client privilege. It is intended solely for the addressee(s); access to anyone else is unauthorized. If this message has been sent to you in error, do not review, disseminate, distribute or copy it. Please reply to the sender that you have received the message in error, then delete it. Thank you for your cooperation.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY  
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF MARY FANNING**

**TO: ALL COUNSEL OF RECORD.**

**PLEASE TAKE NOTICE** that Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited, by and through their undersigned attorneys, and under the Federal Rules of Civil Procedure, will take the deposition of the following individual, to be recorded by both videography and stenographic means, at the following time and place listed below.

<b>Deponent</b>	<b>Place of Deposition</b>	<b>Date and Time</b>
Mary Fanning	Lake Geneva, WI Location details TBD	August 17, 2023 at 9:00 a.m. CST

/s/ Julie M. Loftus

Christopher K. Larus

Minnesota Bar No. 0226828

CLarus@robinskaplan.com

William E. Manske

Minnesota Bar No. 0392348

WManske@robinskaplan.com

Emily J. Tremblay

Minnesota Bar No. 0395003

ETremblay@robinskaplan.com

**ROBINS KAPLAN LLP**

800 LaSalle Avenue, Suite 2800

Minneapolis, MN 55402

Telephone: (612) 349-8500

J. Erik Connolly (admitted *pro hac vice*)

EConnolly@beneschlaw.com

Illinois ARDC No. 6269558

Nicole E. Wrigley (admitted *pro hac vice*)

NWrigley@beneschlaw.com

Illinois ARDC No. 6278749

Michael E. Bloom (admitted *pro hac vice*)

MBloom@beneschlaw.com

Illinois ARDC No. 6302422

Julie M. Loftus (admitted *pro hac vice*)

JLoftus@beneschlaw.com

Illinois ARDC No. 6332174

**BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

71 South Wacker Drive, Suite 1600

Chicago, IL 60606

Telephone: (312) 212-4949

*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 1, 2023 a true and correct copy of the foregoing deposition notice was served via email to the following attorneys of record:

**PARKER DANIELS KIBORT LLC**

Andrew D. Parker  
Ryan Malone  
Joseph A. Pull  
Abraham S. Kaplan  
Nathaniel Greene  
888 Colwell Building  
123 N. Third Street  
Minneapolis, MN 55401  
[parker@parkerdk.com](mailto:parker@parkerdk.com)  
[pull@parkerdk.com](mailto:pull@parkerdk.com)  
[malone@parkerdk.com](mailto:malone@parkerdk.com)  
[kaplan@parkerdk.com](mailto:kaplan@parkerdk.com)  
[greene@parkerdk.com](mailto:greene@parkerdk.com)

**LEWIN & LEWIN**

Nathan Lewin  
888 17<sup>th</sup> Street NW  
4<sup>th</sup> Floor  
Washington, D.C. 20006  
[nat@lewinlewin.com](mailto:nat@lewinlewin.com)

/s/Julie M. Loftus

Julie M. Loftus